



Monitoring Handbook for Developer Grantees

For FY18 and FY19 Grantees

Charter School Programs Monitoring

February 2021
GS-10F-0288W
Base Period

This document was produced in whole with Federal funds from the U.S. Department of Education under contract with WestEd, number GS-10F-0288W. The U.S. Department of Education does not endorse trade names, commercial products, or organizations.

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I. Introduction

Monitoring the implementation of Federal programs and the use of Federal program funds is an essential function of the U.S. Department of Education (ED). This document describes the purpose, rationale, and process used by the Charter School Programs (CSP) office in monitoring the use of CSP funds by grantees to support the planning, initial implementation, replication, or expansion of charter schools. This document will be reviewed and revised periodically to reflect lessons learned and programmatic clarification.

Beyond ensuring compliance with Federal regulations, monitoring supports the alignment of grantee efforts with the goals of the CSP and the principles of the *Elementary and Secondary Education Act* (ESEA) of 1965, as amended by the Every Student Succeeds Act (ESSA). Monitoring provides ED and grantee stakeholders with the data necessary to make educational improvements and holds grantees accountable for ensuring that charter schools and their students are well-supported in their pursuit of academic excellence.

Monitoring and the Strategic Plan

ED's 2018–2022 *Strategic Plan*¹ focuses on teaching and learning for students at all levels from early childhood education to college and career. The goals focus on improving learning outcomes for students at each level; strengthening the quality and use of data; and improving the effectiveness, efficiency, and accountability of ED. Regular monitoring of ED grant programs, such as the CSP, contributes to the accomplishment of the objectives and strategies outlined in the plan. It also supports the core principles of ESEA by helping States and other grantees leverage the law to improve academic performance for all students.

The ED *Handbook for the Discretionary Grant Process* (2020) states that active discretionary grants are to be monitored with a focus on technical assistance, continuous improvement, and attaining promised results. Monitoring is intended to ensure that grantees achieve expected results and assure compliance with all related requirements. To support this work, ED has contracted WestEd to conduct monitoring activities for select grantees.

WestEd supports the CSP's risk management efforts by providing annual implementation data on a subset of grantees. Monitoring data can identify specific concerns or risk factors from individual grantees or trends across grantees. Risk management efforts include the following:

- Individual monitoring reports identify implementation issues and other discrepancies from the approved grant program
- Annual comprehensive monitoring and data collection reports
- Post-visit debrief calls identify any implementation concerns or potential risks immediately following a monitoring visit
- Select monitoring findings are used to inform grantee site visit selection for each year

¹ The Department of Education's Strategic Plan 2018 – 2022 is available at <http://www2.ed.gov/about/reports/strat/index.html>

Definition and Purpose of Monitoring

Monitoring is the regular and systematic examination of a grantee’s administration and implementation of a Federal education grant, contract, or cooperative agreement administered by ED. Monitoring the use of Federal funds has long been an essential function of ED, which monitors programs under the general administrative authority of the U.S. Department of Education Organization Act. Also, Section 80.40(e) of Education Department General Administrative Regulations (EDGAR) permits ED to make site visits as warranted by program needs.

ED policy requires every Program Office overseeing discretionary or formula grant programs to prepare a monitoring plan for each of its programs. The plans are designed to link established monitoring to achieving program goals and objectives; adhering to laws, regulations, and assurances governing the program; and conforming to the approved application and other relevant documents. Each Principal Office was advised to monitor (a) for results; (b) to ensure compliance with the law; and (c) to protect against waste, fraud, and abuse.

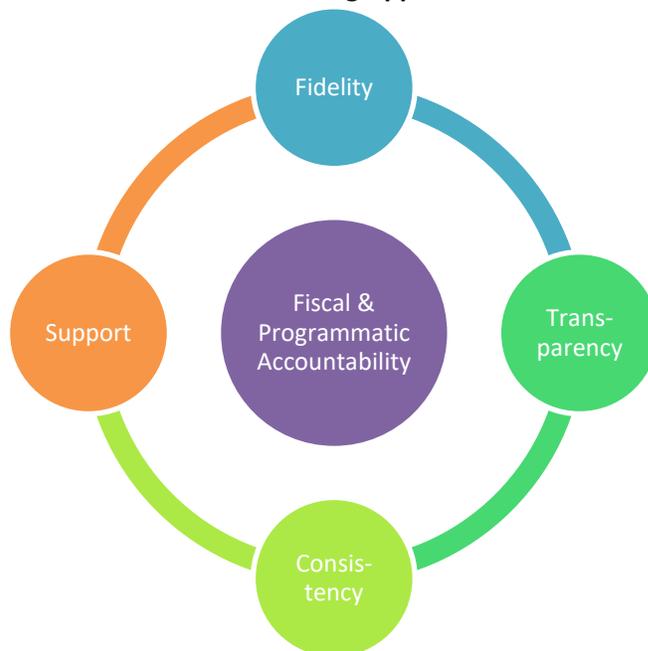
The primary purpose of WestEd’s monitoring approach is to ensure fiscal and programmatic accountability of programs and projects by providing objective implementation data. WestEd does this by using a monitoring approach that is uniquely designed for each program and focuses on critical concepts of program fidelity and financial responsibility. Complementary to this is an effort to support the quality of grant projects by identifying areas of noncompliance and technical assistance for corrective action and improvement. Our monitoring approach is based on four concepts:

- **Fidelity** to program requirements
- **Transparency** of monitoring expectations, content, and process
- **Consistency** in approach and analysis
- **Support** to stakeholders and participants

The central question to WestEd’s monitoring approach is whether or not the grantee is implementing its grant project as approved. Thus, monitoring serves not only as a means for helping grantees achieve high-quality implementation of their CSP grant project, but also helps ED to be a better advisor and partner in that effort. CSP monitoring efforts are designed to focus on the results of grantees’ efforts to implement critical requirements of the CSP using available resources and guidance. Information and data from monitoring also assist to inform the program’s performance indicators under the Government Performance Results Act (GPRA).

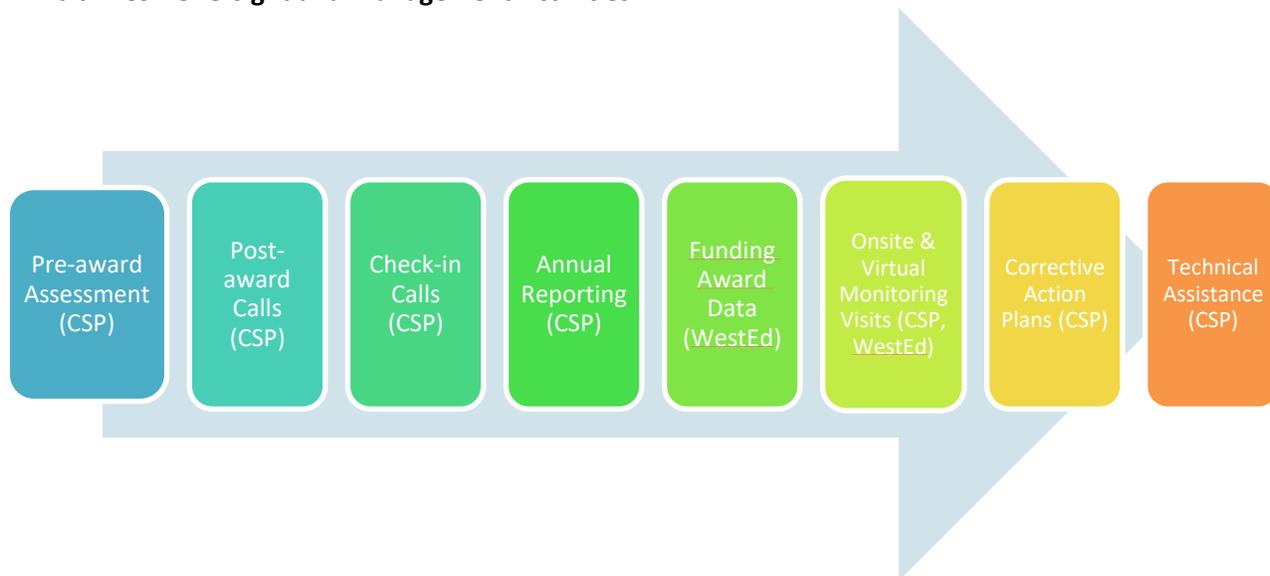
Monitoring and data collection occur within a larger realm of CSP oversight and management activities. The end goal of these activities is to mitigate risk as it relates to the awarded grants and the CSP. These program oversight and management activities include regular reporting requirements (e.g., Annual

Exhibit 1. Monitoring Approach



Performance Reports [APRs]), regular check-in calls, and other ongoing grant management activities. As Exhibit 2 illustrates below, monitoring and data collection are just two of several opportunities for CSP staff to collect information on grantee performance.

Exhibit 2. CSP Oversight and Management Activities



The information collected through the monitoring and data collection activities complement the existing CSP, Common Core of Data, and ED*Facts* data captured through other project activities. This reduces the reporting requirements for grantees while providing a more complete picture of grant implementation and impact for the CSP.

Technical Assistance Approach

WestEd provides technical assistance to CSP grantees and staff throughout the course of monitoring activities. Technical assistance opportunities include the following:

- [Monitoring preparations webinar for all grantees](#)
- [One-on-one pre-visit technical assistance calls for grantees selected to be monitored](#)
- [Monitoring sessions at annual CSP Project Directors meetings](#)

In addition, WestEd project staff and monitors are available to troubleshoot any issues grantees have with monitoring preparations.

II. Data Collection Process and Methodology

CSP's monitoring plan will help grantees support student achievement by building capacity to improve the quality of charter schools and ensure program compliance. Each grantee will be monitored at least once during its program period. Through the WestEd monitoring process, the monitoring team will collect data specific to defined indicators to determine program compliance, performance, and risk. The monitoring process is a 'snapshot' of grantee implementation of the CSP grant from the beginning of the grantee's current performance period to the time of the monitoring site visit. Monitoring outside of the scheduled cycle may be arranged as needed if a

grantee has serious or chronic compliance problems or has unresolved issues identified by ED or through the monitoring process.

Exhibit 3. Monitoring Process



Pre-visit Preparations

Grantees and monitors are involved in pre-visit preparations. For the grantees, WestEd conducts both a pre-visit webinar for all grantees and individual meetings with each grantee to provide an overview of the monitoring process and to inform the grantee of its role in preparing for the site visit. Grantee roles include collaborating with WestEd to develop the site visit schedule and to upload documentation to a cloud-based system, as well as preparing the interviews and focus groups. The grantee is expected to develop the agenda for the visit and upload documents relevant to each indicator to provide some indication of the status of its grant-funded project. All relevant documentation and the completed agenda should be submitted to WestEd four weeks prior to the visit.

Prior to every site visit, the monitoring team is responsible for studying the grant application and other documentation provided by CSP. The grant application enables the monitors to understand the proposed grant project. Additional documentation enables the monitors to gain a preliminary understanding of the implementation of some aspects of the proposed project. Documentation submitted by the grantee provides additional information on the project status and helps the monitors identify important questions to ask during the site visit.

Site Visit (Onsite and Virtual)

Onsite and virtual monitoring visits follow the monitoring approach and process noted above. All onsite, multi-site visits include interviews with relevant grantee staff at their respective locations, as well as at a subset of grant-funded school sites. Onsite single-site visits include interviews with relevant grantee staff at their respective locations. The scope of the virtual visits is guided by the same grant-specific indicator protocol; however, interviews for these visits are conducted via video conferencing. Virtual

monitoring visits have been used for Developer grantees historically and have become standard practice during the COVID-19 pandemic across all grant types. Until schools are open and travel is safe, all site visits will be conducted virtually.

- **Multi-site visits** are for grantees that have more than one grant-funded school supported by their grant. For these grantees, WestEd includes a subset of four to six grant-funded schools in the monitoring process. Visits to these grant-funded schools (regardless of onsite or virtual approach), include interviews with the School Director, Business Manager, and Governing Board members. For onsite visits, the monitoring team also does a brief walk-through of the school.
- **Single-site visits** are for grantees that have one grant-funded school supported by their grant. For these grantees, WestEd includes staff from the grant-funded school in the interviews as appropriate. In some instances, such as for Developer grantees, the grantee and school staff may be the same.

Post-visit Debrief and Analysis

Following the completion of the site visit, the monitoring team synthesizes and analyzes all available evidence to understand the grant project implementation. In the week following the monitoring visit, WestEd schedules a debrief call with the CSP Program Officer and the monitoring team to discuss all preliminary monitoring findings. The intention of this debrief is to confirm the monitoring team's understanding of implementation observations, to highlight any immediate concerns for the CSP Program Officers, and to identify any additional information that is needed from the grantee to clarify preliminary findings.

Report Review and Finalization

All monitoring reports progress through a series of stakeholder reviews. Initially, the first draft is reviewed by the assigned CSP Program Officer and Team Lead (as needed). Upon completion of all CSP reviews and approval, WestEd sends the revised report to the grantee for a technical review. WestEd includes grantee comments in report revisions, as necessary, to ensure the technical accuracy. WestEd sends the revised report to CSP for final review and approval. WestEd finalizes the report after all reviews and revisions are complete.

Corrective Action Planning

Once reports are finalized, CSP Program Officers share final reports with grantees and initiate any necessary corrective action plans and related processes. Grantees are expected to identify corrective actions for each identified implementation issue in their finalized monitoring report and to work with their CSP Program Officer to rectify each implementation issue within one year. WestEd monitors typically do not participate in the corrective action planning process but are available as needed to explain specific implementation findings.

III. Monitoring Indicators

The content of monitoring is based on the grantee's responsibility to carry out the requirements of CSP and provide guidance and support to charter schools and other stakeholders based on the requirements of Federal charter school law and nonregulatory guidance. Monitoring includes a close review of State policies, systems, and procedures to ensure grantee and grant-funded charter school compliance with Federal statutes and regulations and to support the goals of the CSP.

ED uses clear and consistent criteria—monitoring indicators—to determine the degree of implementation of grantee programs and activities. CSP staff have developed indicators in the following monitoring areas:

- [Charter School Status and Application Fidelity](#)
- [Grantee Quality](#)
- [Administrative and Fiscal Responsibilities](#)

A more detailed discussion of each of these monitoring areas and the corresponding indicators is presented in the following sections.

Charter School Status and Application Fidelity

This section focuses on the grantee’s obligation to meet certain statutory requirements and invitational priorities to implement the project as proposed. The requirements and priorities reflected in this section are related to the Federal definition of a charter school, program and management plan implementation, and student outreach and equal access. It includes indicators that address the grantee’s performance in fulfilling its responsibilities to:

- [Ensure that the charter school continues to meet the Federal definition of a charter school](#)
- [Implement the educational program described in its approved CSP grant application](#)
- [Implement the management plan described in its approved CSP grant application](#)
- [Inform students in the community about the charter school and give them an equal opportunity to attend the charter school](#)

Grantee Quality

This section focuses on how the grantee addresses the competition priorities, demonstrates it has quality controls in place, and assists educationally disadvantaged students. It includes indicators that address the grantee’s performance in fulfilling its responsibilities to:

- [Address the competition priorities of the grant](#)
- [Demonstrate that the school has quality controls for continued operations and closure](#)
- [Assists educationally disadvantaged students](#)

Administrative and Fiscal Responsibilities

CSP grantees incur specific administrative and fiscal responsibilities under Federal law. This section focuses on the grantee’s allocation of, use of, and controls over the CSP grant funds, as well as associated responsibilities in adhering to grant conditions. It includes indicators that cover the grantee’s responsibility to:

- [Use grant funds only for allowable activities](#)
- [Use fiscal control and fund accounting procedures to ensure proper disbursement of and accounting for grant funds](#)
- [Ensure compliance with grant conditions, including any specific conditions imposed on the grant, and maintain appropriate grant records](#)

The use of these monitoring indicators ensures a consistent application of standards across monitoring teams and across grantees. The published indicators provide guidance for all Developer grantees regarding the purpose and intended outcomes of monitoring by describing what is being monitored, the standards expected, and the acceptable evidence that will be used in judging the quality of program implementation.

IV. Monitoring Indicators, Guiding Questions, and Acceptable Evidence

The indicators that will be used by the site visit monitoring team for each grantee are contained in this section. Each monitoring indicator includes a short title, the complete text of the indicator, criteria for meeting the indicator, lists of acceptable evidence that grantees and subgrantees must or can provide to show the grantee's compliance, and the indicator sources and references.

Section 1: Charter School Status and Application Fidelity

INDICATOR 1.1: DEFINITION OF CHARTER SCHOOL. The Developer grantee meets the Federal definition of a “charter school.”		
<i>Criteria for Meeting Indicator</i>	<i>Sample Guiding Questions</i>	<i>Examples of Acceptable Evidence</i>
The grantee demonstrates that it meets and will continue to meet the Federal definition of the term “charter school” throughout the period of Federal funding.	Describe how the grantee meets all aspects of the Federal term “charter school” throughout the life of the grant.	Charter contract with authorizer Charter renewal and/or addenda
	What is the State’s definition of a charter school?	State charter requirements, statute, and/or State law’s definition of charter school
	Does the school’s or State’s definition of charter school differ from the Federal definition of charter school?	Proof of nonprofit status
	How does the grantee ensure that it complies with all Federal laws, including IDEA, in its implementation of the charter school?	Lottery and enrollment policy Performance requirements to demonstrate school and student growth
	Are there any State or local restrictions that restrict the flexibility and autonomy of the school?	
<i>Indicator Sources/References</i>		
ESEA Section 4310(2). Definitions and Application Requirement: 2018 (h)(k); 2019 (a)(4), (i)(1)(2) and (j)		
(1) CHARTER SCHOOL – The term ‘charter school’ means a public school that—		
(A) in accordance with a specific State statute authorizing the granting of charters to schools, is exempt from significant State or local rules that inhibit the flexible operation and management of public schools, but not from any rules relating to the other requirements of this definition		
(B) is created by a developer as a public school, or is adapted by a developer from an existing public school, and is operated under public supervision and direction		
(C) operates in pursuit of a specific set of educational objectives determined by the school's developer and agreed to by the authorized public chartering agency		
(D) provides a program of elementary or secondary education, or both		
(E) is nonsectarian in its programs, admissions policies, employment practices, and all other operations, and is not affiliated with a sectarian school or religious institution		
(F) does not charge tuition		
(G) complies with the Age Discrimination Act of 1975, title VI of the Civil Rights Act of 1964, title IX of the Education Amendments of 1972, section 504 of the Rehabilitation Act of 1973, Americans with Disabilities Act of 1990 (FERPA), and part B of the Individuals with Disabilities Education Act		
(H) is a school to which parents choose to send their children, and that (1) admits students on the basis of a lottery, if more students apply for admission than can be accommodated; or (2) in the case of a school that has an affiliated charter school, automatically enrolls students who are enrolled in the immediate prior grade level of the affiliated charter school and , for any additional student openings created through regular attrition in student enrollment in the affiliated charter school, admits students on the basis of a lottery as described in this paragraph		

(I) agrees to comply with the same Federal and State audit requirements as do other elementary schools and secondary schools in the State, unless such State audit requirements are specifically waived by the State

(J) meets all applicable Federal, State, and local health and safety requirements

(K) operates in accordance with State law

(L) has a written performance contract with the authorized public chartering agency in the State that includes a description of how student performance will be measured in charter schools pursuant to State assessments that are required of other schools and pursuant to any other assessments mutually agreeable to the authorized public chartering agency and the charter school

(M) may serve students in early childhood education programs or postsecondary students

(2) How each school will have a high degree of autonomy over budget and operations and personnel decisions

Selection Criteria: FY 2019 (b)(1)(ii)(iii)

The extent to which (ii) one or more charter schools operated by the applicant have closed or a charter revoked due to noncompliance and (iii) schools operated by the applicant have had any significant issues in the financial operations management or student safety.

INDICATOR 1.2: PROGRAM IMPLEMENTATION. The Developer grantee implements the educational program described in its grant application.

<i>Criteria for Meeting Indicator</i>	<i>Sample Guiding Questions</i>	<i>Examples of Acceptable Evidence</i>
The educational program implemented by the grantee addresses the needs of the targeted population.	What is the educational program of the charter school?	Description of educational program implemented during grant period
The educational program implemented by the grantee (and planned for the remainder of the grant period) is substantially the same as that described in its approved application.	How is it implemented? What grade levels or ages of students are served? What curricula and instructional programs and materials are used?	Student enrollment per grant year, including changes to enrollment targets
The educational program implemented by the grantee enables all students to meet challenging State student academic achievement standards.	How does the educational program enable all students to meet challenging State student academic achievement standards?	Curricula used during each grant year
Parents and community members are meaningfully involved in the operation of the charter school.	How are parents and other members of the community meaningfully involved in the operation of the charter school?	Faculty and staff assignments by grade Parent meeting agendas and minutes Parent survey feedback Parent engagement activities in school operations during grant period

Indicator Sources/References

Application Requirement: FY 2018 (c)(e), (l) and (m); FY 2019 (a)(5)(7), (b)(1)(2), (g) and (i)(1)

- (1) If providing a single-sex educational program, the applicant must demonstrate that the proposed single-sex educational programs are in compliance with Title IX.
- (2) A request and justification for any waivers of Federal statutory or regulatory requirements that the applicant believes are necessary to implement its proposed project.
- (3) A description of the educational program that will be implemented in the charter school receiving funding:
 - (1) Information on how the program will enable all students to meet the challenging State academic standards
 - (2) The grade levels or ages of students who will be served
 - (3) The instructional practices that will be used
- (4) A description of how the applicant will solicit and consider input from parents and other members of the community on the implementation and operation of each charter school that will receive funds.
- (5) A description of how the applicant will support the use of effective parent, family, and community engagement strategies to operate each charter school that will receive funds.

Selection Criteria: FY 2018 (2)(ii); FY 2019 (2)(ii) and (3)(i) In determining the quality of the design of the proposed project, the Secretary considers the following criteria:

The extent to which the design of the proposed project is appropriate to, and will successfully address, the needs of the target population or other identified needs.

INDICATOR 1.3: MANAGEMENT PLAN IMPLEMENTATION. The implementation of the Developer grantee’s management plan reflects what was described in the grantee’s application and is operational.

<i>Criteria for Meeting Indicator</i>	<i>Sample Guiding Questions</i>	<i>Examples of Acceptable Evidence</i>
The management plan implemented by the grantee to date and planned for the remainder of the grant period is substantially the same as that described in its approved application.	Has there been a change in the structure of the management plan or personnel since the CSP application was approved? If so, was ED notified of the change(s)?	Grant management plan Organizational chart during grant period Job descriptions for key personnel
The roles and responsibilities of the grantee, partner organizations, and CMOs (if applicable), including contracted staff, are substantially the same as those described in its approved application.	Does the grantee contract another entity for any of its management activities? If so, which entity and which activities?	ED approval of new Project Director and key personnel, including correspondence (if applicable) Governing Board member bios/resumes, bylaws, and meeting minutes
Qualified personnel for implementing the CSP project are substantially the same as those described in its approved application.	What is the composition of the school’s governing Board? What is the governing Board’s role and responsibility? Who is responsible for identifying and overseeing appropriate facilities?	Board professional development Facilities contract during grant period

Indicator Sources/References

Application Requirement: FY 2018 (a); FY 2019 (a)(2)

(1) A description of the roles and responsibilities of the eligible applicant, partner organizations, and charter management organizations, including the administrative and contractual roles and responsibilities of such partners.

Selection Criteria: FY 2018 (a)(iii)(2) and (b)(iii)(2); FY 2019 (a)(3)(ii) and (b)(4)(ii) Quality of Project Personnel: In determining the quality of project personnel, the Secretary considers:

(2) The qualifications, including relevant training and experience, of key project personnel.

Selection Criteria: FY 2018 (a)(iv) and (b)(iv); FY 2019 (a)(4) and (b)(5) Quality of the Management Plan: In determining the quality of the management plan for the proposed project, the Secretary considers:

The adequacy of the management plan to achieve the objectives of the proposed project on time and within budget, including clearly defined responsibilities, timelines, and milestones for accomplishing project tasks.

INDICATOR 1.4: RECRUITMENT, LOTTERY, AND ENROLLMENT. The Developer grantee informs students in the community about the charter school and gives them an equal opportunity to attend.

<i>Criteria for Meeting Indicator</i>	<i>Sample Guiding Questions</i>	<i>Examples of Acceptable Evidence</i>
<p>The grantee demonstrates that it informs students in the community, including students with disabilities, English learners, and other educationally disadvantaged students, about the charter school and its enrollment policies and practices.</p> <p>The grantee demonstrates that students in the community, including students with disabilities, English learners, and other educationally disadvantaged students, are given an equal opportunity to attend the charter school, by implementing a lottery if necessary.</p>	<p>What is the school’s student outreach plan? What marketing and advertising activities has it used?</p> <p>Does the school target specific communities for outreach?</p> <p>Does the school implement a lottery? If so, what are the lottery policies? Are any students given preferences to attend? If so, what are those preferences? How is the lottery implemented?</p> <p>What are the school’s enrollment policies and practices?</p> <p>Are students from affiliated charter schools given automatic enrollment to the school?</p>	<p>Recruitment plan</p> <p>Recruitment flyers and marketing materials</p> <p>Enrollment policy, process, forms, and timelines</p> <p>Lottery policy, preferences, procedures, and timelines</p> <p>State law related to enrollment preferences</p> <p>Lottery application numbers or lottery statistics each grant year</p> <p>Waitlist numbers each grant year</p> <p>Automatic enrollment guidelines from other network schools</p>

Indicator Sources/References

Application Requirement: FY 2018 (i); FY 2019 (c)(d)

A description of how the applicant will ensure that each charter school that will receive funds will recruit, enroll, and retain students, including children with disabilities, English learners, and other educationally disadvantaged students, including the lottery and enrollment procedures that will be used for each charter school if more students apply for admission than can be accommodated, and, if the applicant proposes to use a weighted lottery, how the weighted lottery complies with section 4303(c)(3)(A) of the ESEA.

Section 2: Grantee Quality

INDICATOR 2.1: COMPETITION PRIORITIES. The Developer grantee addresses the competition priorities.		
<i>Criteria for Meeting Indicator</i>	<i>Sample Guiding Questions</i>	<i>Examples of Acceptable Evidence</i>
<p>FY 2018, as applicable:</p> <p>CPP1: The charter school supports high-need students by increasing access to high-quality educational choice.</p> <p>CPP2: The charter school provides dual or concurrent enrollment programs and/or early college high schools.</p> <p>CPP3: The charter school was a single school operator at the time of CSP application submission.</p> <p>FY 2019, as applicable:</p> <p>AP1: The charter school specifies whether it operates in a rural community.</p> <p>CPP1: The charter school is located in a qualified opportunity zone.</p> <p>CPP2: The charter school serves a high proportion of Native American students, has a mission to address the educational needs of such students, and has a Board that reflects the student population served.</p> <p>CPP3: The charter school was a single school operator at the time of CSP application submission.</p> <p>CPP4: The charter school received opportunity funds from a specified donor for specific purposes, as proposed.</p>	<p>FY 2018, as applicable:</p> <p>CPP1: What approaches does the school use to improve academic outcomes and learning environments for students?</p> <p>CPP1: How does the school track student achievement, particularly for students living in poverty, rural students, students with disabilities, and English learners?</p> <p>CPP2: What coursework distinguishes dual, concurrent, or early college high school programming?</p> <p>CPP3: How many schools does the grantee operate?</p> <p>FY 2019, as applicable:</p> <p>CPP1: How does the school qualify to operate in an opportunity zone?</p> <p>CPP2: What type of targeted outreach and recruitment was/is conducted to ensure a high proportion of Native American students?</p> <p>CPP3: How many schools does the grantee operate?</p> <p>IP: Did the grantee receive opportunity funds?</p>	<p>FY 2018, as applicable:</p> <p>CPP1: Intervention strategies for rural students, students with disabilities, English learners, and students from Federally recognized Indian Tribes, including the percentages served from the applicable subgroups</p> <p>CPP2: Evidence of dual or concurrent enrollment or early college high school programs</p> <p>CPP3: Operation of one school at the time of application.</p> <p>FY 2019, as applicable:</p> <p>AP: Operation of a school in a rural community and locale classification</p> <p>CPP1: Census tract number of the qualified opportunity zone in which the school is located</p> <p>CPP2: Outreach materials for Native American students, mission that addresses needs of Native American students, percentage of Board members who are members of Indian Tribes or Native American organizations, and collaboration with Indian Tribes or Native American organizations</p> <p>CPP3: Operation of one school at the time of application</p> <p>IP: Donor for and receipt of opportunity funds as well as purpose for which funds were used</p>
Indicator Sources/References		

INDICATOR 2.1: COMPETITION PRIORITIES. The Developer grantee addresses the competition priorities.

Absolute Priority FY 2019 (a)(b); Competitive Preference Priorities: FY 2018 (1)(2)(3); FY 2019 (1)(2)(3)(4); Invitational Priority (1)(2)(3)(4)

FY 2018

Competitive Preference Priority 1—Supporting high-need students by increasing access to high-quality educational choice. Projects designed to increase access to educational choice and improve academic outcomes and learning environments for one or more of the following groups of students: (i) Students in communities served by rural local educational agencies, (ii) Children with disabilities, (iii) English learners, (iv) Students who are members of Federally recognized Indian Tribes

Competitive Preference Priority 2—Dual or concurrent enrollment programs and early college high schools. Projects designed to increase student access to, participation in, and completion of dual or concurrent enrollment programs or early college high schools.

Competitive Preference Priority 3—Single school operators. Applicants operate one, and only one, charter school.

FY 2019

Absolute Priority—Rural Community. Applicants must open a new charter school or replicate or expand a high-quality charter school in one of the following: (a) a rural community or (b) a community that is not a rural community

Competitive Preference Priority 1—Spurring investment in opportunity zones. Applicant must open a new charter school or replicate or expand a high-quality charter school in a qualified opportunity zone. Applicant must provide the census tract number of the qualified opportunity zone.

Competitive Preference Priority 2—Serve Native American students. Applicant must:

(a) Open a new charter school or replicate or expand a high-quality charter school that—

(1) Utilizes targeted outreach and recruitment in order to serve a high proportion of Native American students

(2) Has a mission and focus that will address the unique educational needs of Native American students, such as through the use of instructional programs and teaching methods that reflect and preserve Native American language, culture, and history, and

(3) Has or will have a governing board with a substantial percentage of members who are members of Indian Tribes or Native American organizations located within the area to be served by the new, replicated, or expanded charter school

(b) Letter of support from at least one Indian Tribe or Native American organization located within the area to be served by the charter school

(c) Meaningfully collaborate with the Indian Tribe(s) or Native American organization(s) from which the applicant has received a letter of support in an ongoing manner in the development and implementation of the educational program at the charter school.

Competitive Preference Priority 3—Single school operators. Applicants operate one, and only one, charter school.

Competitive Preference Priority 4—Novice applicants. Applicants that are new to the CSP competition.

Invitational Priority—Opportunity Funds. Applicants that have or will receive an investment from a qualified opportunity fund for one or more of the following:

(1) to acquire an interest in real property

(2) to construct new facilities, renovations, repairs, or alterations to existing facilities

(3) toward predevelopment costs

(4) to acquire other tangible property.

INDICATOR 2.2: QUALITY CONTROLS. The Developer grantee has quality controls in place to mitigate risk to sustain the continued operations of the charter school and, in the case of closure, ensure appropriate closure protocols are used.

<i>Criteria for Meeting Indicator</i>	<i>Sample Guiding Questions</i>	<i>Examples of Acceptable Evidence</i>
The charter school has a plan that details what it would do to ensure the appropriate succession of the Project Director, if they were to leave.	What plan does the grantee have in place to replace the Project Director if the staff member leaves the school/organization?	Written plans for replacing Project Director in case of turnover
The business plan sustains the charter school beyond the grant period.	How does the grantee plan to continue operating the school once the CSP grant expires?	Written plans for continued operations after grant ends, including stakeholder commitments and financial support
The grantee has written policies or practices for charter school closure, including how students will be assisted in finding high-quality schools to attend.	Is there a written plan for the closure protocol if the school were to close? What is the school’s plan for assisting students to attend other high-quality schools if the school were to close?	Written policies and procedures for school closure, including how students will be placed at other high-quality schools

Indicator Sources/References

Application Requirement: FY 2018 (d); FY 2019 (a)(6) The extent to which the eligible applicant is prepared to continue to operate charter schools that would receive grant funds in a manner consistent with the eligible applicant’s application once the grant funds under this program are no longer available.

Selection Criteria: FY 2018 (a)(v) and (b)(vi); FY 2019: (a)(5) and (b)(6) Continuation Plan

INDICATOR 2.3: ASSISTING EDUCATIONALLY DISADVANTAGED STUDENTS. The charter school assists educationally disadvantaged students.

<i>Criteria for Meeting Indicator</i>	<i>Sample Guiding Questions</i>	<i>Examples of Acceptable Evidence</i>
<p>The charter school addresses the needs of educationally disadvantaged students, including students with disabilities and English learners, in meeting/exceeding State academic content and achievement standards and graduating college- and career-ready.</p> <p>The grantee tracks the contribution the project makes in assisting educationally disadvantaged students and acts on information related to assisting educationally disadvantaged students.</p> <p>The charter school tracks suspensions and expulsions for all students and each subgroup and uses these data to develop approaches to reduce out-of-class time for students.</p>	<p>Please describe how the school addresses the needs of educationally disadvantaged students, including students with disabilities and English learners.</p> <p>How does the grantee monitor the progress of educationally disadvantaged students?</p> <p>What interventions does the grantee have in place to reduce the number of expulsions and suspensions?</p> <p>What are the school’s discipline practices for students?</p>	<p>Student enrollment and demographics by subgroup for each grant year, dashboards</p> <p>Intervention approach to serving students with disabilities, including certifications and staff-to-student ratios</p> <p>Intervention approach to serving English learners, including certifications and staff-to-student ratios</p> <p>School discipline policy and procedures</p> <p>Percentages of suspensions and expulsions for each grant year, including by subgroup</p> <p>Parent/student handbooks</p>

Indicator Sources/References

Application Requirements FY 2018 (g)(j)(i); FY 2019 (a)(1)

- (1) A description of how each school that will receive funds will support all students once they are enrolled to promote retention, including by reducing the overuse of discipline practices that remove students from the classroom.
- (2) A description of how the applicant will ensure that all eligible children with disabilities receive a free appropriate public education in accordance with Part B of the IDEA.
- (3) A description of how the eligible applicant will ensure that charter schools receiving funding meet the educational needs of their students, including children with disabilities and English learners.

Selection Criteria: FY 2018 (a)(i) and (b)(i); FY 2019 (a)(1) and (b)(2)

Contribution in assisting educationally disadvantaged students

- (1) The significance of the contribution the proposed project will make in expanding opportunities for educationally disadvantaged students and enabling those students to meet challenging State academic standards.

Note: Educationally disadvantaged students means economically disadvantaged children, children with disabilities, migrant children, English learners, neglected or delinquent children, and homeless children.

Section 3: Administrative and Fiscal Responsibilities

INDICATOR 3.1: USE OF GRANT FUNDS. The CSP funds grant are used only for allowable activities.		
<i>Criteria for Meeting Indicator</i>	<i>Sample Guiding Questions</i>	<i>Examples of Acceptable Evidence</i>
<p>The grantee demonstrates that CSP funds are used only for allowable, allocable, and reasonable activities.</p> <p>The grantee demonstrates that grant funds are used for only the grant-funded school identified in the grant application.</p> <p>The grantee demonstrates that grant funds are used for proposed and approved activities.</p> <p>The grantee demonstrates that the school funded under this grant did not receive another CSP grant for the same purpose.</p>	<p>What is the grantee’s understanding of allowable expenditures under this grant? Describe the process by which the grantee determines allowable activities.</p> <p>Has the grantee expended grant funds according to its approved budget? Has ED approved any changes in how the CSP funds can be used since the CSP budget was first approved? If so, what were the reasons for the change(s)? Is there documentation of ED approval?</p> <p>Has the grantee overspent or underspent grant funds in its proposed budget categories? If so, what are the reasons for not spending as planned?</p>	<p>Three types of budgets:</p> <ol style="list-style-type: none"> 1) First approved CSP budget immediately after grant award 2) Year-to-date CSP budget showing approved amount, expended amount, and remaining amount in each budget category 3) Each modified and ED-approved CSP budget, along with ED approvals, including correspondence <p>Transaction detail report or general ledger itemizing CSP expenditures for each grant year</p> <p>Sample of invoices for large purchases made</p> <p>Grant award notification for each grant period</p>
<i>Indicator Sources/References</i>		
<p>Application and Submission Information: 4. Funding Restrictions Grant funds must be used to carry out allowable activities, which include the following:</p> <p>(a) Preparing teachers, school leaders, and specialized instructional support personnel, including through paying costs associated with—</p> <ol style="list-style-type: none"> (i) Providing professional development; and (ii) Hiring and compensating, during the applicant’s planning period specified in the application for funds, one or more of the following: <ol style="list-style-type: none"> (A) Teachers (B) School leaders (C) Specialized instructional support personnel <p>(b) Acquiring supplies, training, equipment (including technology), and educational materials (including developing and acquiring instructional materials).</p> <p>(c) Carrying out necessary renovations to ensure that a new school building complies with applicable statutes and regulations, and minor facilities repairs (excluding construction).</p> <p>(d) Providing one-time, startup costs associated with providing transportation to students to and from charter school.</p> <p>(e) Carrying out community engagement activities, which may include paying the cost of student and staff recruitment.</p> <p>(f) Providing other appropriate, non-sustained costs related to the opening of new charter schools, or the replication or expansion of high-quality charter schools, when such costs cannot be met from other sources.</p>		

INDICATOR 3.1: USE OF GRANT FUNDS. The CSP funds grant are used only for allowable activities.

Application Requirements: FY 2018 (d) and (f); FY 2019 (a)(6), (8), and (f)

- (1) A description of the applicant's planned activities and expenditures of funds to support activities, and how the applicant will maintain financial sustainability after the end of the grant period as well as a budget narrative, aligned with activities, that outlines how grant funds will be expended to carry out the planned activities.
- (2) A description of how the applicant has considered and planned for the transportation needs of students.

Eligibility Information: FY 2018 3. Other; FY 2019 4. Funding Restrictions

A grant under this competition may be for a period of not more than five years, of which the grantee may use not more than 18 months for planning and program design. Applicants may propose to support only one charter school per grant application.

Reasonable and Necessary Costs: FY 2018; FY 2019 Applicants must ensure that all costs included in the proposed budget are reasonable and necessary in light of the goals and objectives of the proposed project. A charter school that previously received funds for replication or expansion or initial implementation of a charter school may not use funds under this grant for the same purpose. However, such charter school may be eligible to receive funds under this competition to expand the charter school beyond the existing grade levels or student count. Likewise, a charter school that receives funds under this competition is ineligible to receive funds for the same purpose under section 4303(b)(1) or 4305(b) of the ESEA, including opening and preparing for the operation of a new charter school, opening and preparing for the operation of a replicated high-quality charter school, or expanding a high-quality charter school (i.e., CFDA 84.282A or 84.282M).

Code of Federal Regulations - Title 2, Subtitle A, Chapter II, Part 200 – Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards

Subpart E – COST PRINCIPLES

34 CFR 200.403 – Factors affecting allowability of costs.

Except where otherwise authorized by statute, costs must meet the following general criteria in order to be allowable under Federal awards:

- (a) Be necessary and reasonable for the performance of the Federal award and be allocable thereto under these principles.
- (b) Conform to any limitations or exclusions set forth in these principles or in the Federal award as to types or amount of cost items.
- (c) Be consistent with policies and procedures that apply uniformly to both Federally financed and other activities of the non-Federal entity.
- (d) Be accorded consistent treatment. A cost may not be assigned to a Federal award as a direct cost if any other cost incurred for the same purpose in like circumstances has been allocated to the Federal award as an indirect cost.
- (e) Be determined in accordance with generally accepted accounting principles (GAAP)
- (f) Not be included as a cost or used to meet cost sharing or matching requirements of any other Federally financed program in either the current or a prior period.
- (g) Be adequately documented. See also §§ 200.300 Statutory and national policy requirements through 200.309 Period of performance of this part.

34 CFR 200.405 – Allocable costs.

- (a) A cost is allocable to a particular Federal award or other cost objective if the goods or services involved are chargeable or assignable to that Federal award or cost objective in accordance with relative benefits received. This standard is met if the cost: (1) Is incurred specifically for the Federal award; (2) Benefits both the Federal

INDICATOR 3.1: USE OF GRANT FUNDS. The CSP funds grant are used only for allowable activities.

award and other work of the non-Federal entity and can be distributed in proportions that may be approximated using reasonable methods; and (3) Is necessary to the overall operation of the non-Federal entity and is assignable in part to the Federal award.

(b) All activities which benefit from the non-Federal entity's indirect cost, including unallowable activities and donated services by the non-Federal entity or third parties, will receive an appropriate allocation of indirect costs.

(c) Any cost allocable to a particular Federal award under the principles provided for in this part may not be charged to other Federal awards. However, this prohibition would not preclude the non-Federal entity from shifting costs that are allowable under two or more Federal awards in accordance with existing Federal statutes, regulations, or the terms and conditions of the Federal awards.

(d) Direct cost allocation principles. If a cost benefits two or more projects or activities in proportions that can be determined without undue effort or cost, the cost should be allocated to the projects based on the proportional benefit.

(e) If the contract is subject to CAS, costs must be allocated to the contract pursuant to the Cost Accounting Standards. To the extent that CAS is applicable, the allocation of costs in accordance with CAS takes precedence over the allocation provisions in this part.

INDICATOR 3.2: FISCAL CONTROL AND FUND ACCOUNTING. The Developer grantee uses fiscal control and fund accounting procedures that meet the standards of Financial Management Systems and ensure proper disbursement of and accounting for grant funds.

<i>Criteria for Meeting Indicator</i>	<i>Sample Guiding Questions</i>	<i>Examples of Acceptable Evidence</i>
The grantee’s fund accounting procedures are adequate to meet the Federal standards of Financial Management Systems and ensure proper disbursement of and accounting for Federal funds.	Describe the fiscal control and fund accounting procedures the grantee uses to ensure proper disbursement of and accounting for Federal CSP funds.	Financial procedures manual detailing procurement, conflict of interest, internal controls and separation of duties, disposition of assets, and financial reporting
The grantee’s fiscal controls are adequate to ensure compliance with all applicable Federal requirements including fiscal procedures, competitive bidding processes and contracting procedures, disposition of assets, and conflict of interest provisions.	What accounting system does the grantee use to manage CSP funds? How are project expenditures authorized and made? How are they tracked?	Financial reports provided to governing Board for each meeting Grant management tracking procedures documenting invoices of purchases made as well as schedules for reconciling purchases
The grantee has processes to identify all CSP-funded assets and to dispose of those assets according to regulations if a charter school is closed.	What is the review and approval process for using CSP funds?	Screen shots of the tabs in the financial software system for tracking CSP funds
The grantee has regular audits conducted for its school. If violations are found, the grantee addresses the violations.	How often are CSP budget reports generated and who generates them? How are they used? What is the process for G5 drawdowns and paying vendor balances? Does the grantee have a written conflict of interest policy?	Inventory lists of assets purchased with CSP funds Pictures of CSP-tagged assets Evidence of CSP budget control procedures, including oversight and management of the grant

Indicator Sources/References

Code of Federal Regulations - Title 2, Subtitle A, Chapter II, Part 200 – Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards

Subpart D – POST FEDERAL AWARD REQUIREMENTS

2 CFR 200.302 – Financial management.

(a) The non-Federal entity's financial management systems, including records documenting compliance with Federal statutes, regulations, and the terms and conditions of the Federal award, must be sufficient to permit the preparation of reports required by general and program-specific terms and conditions; and the tracing of funds to a level of expenditures adequate to establish that such funds have been used according to the Federal statutes, regulations, and the terms and conditions of the Federal award.

(b) The financial management system of each non-Federal entity must provide for the following:

- (1) Identification, in its accounts, of all Federal awards received and expended and the Federal programs under which they were received. Federal program and award identification must include, as applicable, the CFDA title and number, Federal award identification number and year, and name of the Federal agency.

INDICATOR 3.2: FISCAL CONTROL AND FUND ACCOUNTING. The Developer grantee uses fiscal control and fund accounting procedures that meet the standards of Financial Management Systems and ensure proper disbursement of and accounting for grant funds.

(2) Accurate, current, and complete disclosure of the financial results of each Federal award or program in accordance with the reporting requirements set forth in §§200.327 Financial reporting and 200.328 Monitoring and reporting program performance.

(3) Records that identify adequately the source and application of funds for federally funded activities. These records must contain information pertaining to Federal awards, authorizations, obligations, unobligated balances, assets, expenditures, income and interest and be supported by source documentation.

(4) Effective control over, and accountability for, all funds, property, and other assets. The non-Federal entity must adequately safeguard all assets and assure that they are used solely for authorized purposes. See §200.303 Internal controls.

(5) Comparison of expenditures with budget amounts for each Federal award.

(6) Written procedures to implement the requirements of §200.305 Payment.

(7) Written procedures for determining the allowability of costs in accordance with Subpart E—Cost Principles of this part and the terms and conditions of the Federal award.

2 CFR 200.313 – Equipment.

(e) **Disposition.** When original or replacement equipment acquired under a Federal award is no longer needed for the original project or program or for other activities currently or previously supported by a Federal awarding agency, the non-Federal entity must request disposition instructions from the Federal awarding agency if required by the terms and conditions of the Federal award. Disposition of the equipment will be made as follows, in accordance with Federal awarding agency disposition instructions:

(1) Items of equipment with a current per unit fair market value of \$5,000 or less may be retained, sold or otherwise disposed of with no further obligation to the Federal awarding agency.

(2) Items of equipment with a current per-unit fair-market value in excess of \$5,000 may be retained by the non-Federal entity or sold. The Federal awarding agency is entitled to an amount from sale by the Federal awarding agency's percentage of participation in the cost of the original purchase. The non-Federal entity may deduct and retain from the Federal share \$500 or ten percent of the proceeds, whichever is less, for its selling and handling expenses.

(3) The non-Federal entity may transfer title to the property to the Federal Government or to an eligible third party provided that, in such cases, the non-Federal entity must be entitled to compensation for its attributable percentage of the current fair market value of the property.

(4) In cases where a non-Federal entity fails to take appropriate disposition actions, the Federal awarding agency may direct the non-Federal entity to take disposition actions.

2 CFR 200.317–327 – Procurement.

(a) The non-Federal entity must have and use documented procedures, consistent with State, local and tribal laws for the acquisition of services under a Federal award.

(b) Non-Federal entities must maintain oversight to ensure contractors perform according to the terms of their contracts.

(1) A grantee must maintain written standards for the selection, award, and administration of contracts covering conflicts of interest.

(c) All procurement transactions for services required under a Federal award must provide a full and open competition consistent with the standards of this section and section 200.320.

2 CFR 200.112 – Conflict of interest.

(a) A grantee may not permit a person to participate in an administrative decision regarding a project if: (1) the decision is likely to benefit that person or a member of his or her immediate family; and (2) the person: (i) is a public official or (ii) has a family or business relationship with the grantee.

INDICATOR 3.2: FISCAL CONTROL AND FUND ACCOUNTING. The Developer grantee uses fiscal control and fund accounting procedures that meet the standards of Financial Management Systems and ensure proper disbursement of and accounting for grant funds.

- (b) A grantee may not permit any person participating in the project to use his or her position for a purpose that is—or gives the appearance of being—motivated by a desire for a private financial gain for that person or for others.

Subpart F – AUDIT REQUIREMENTS

2 CFR 200.501 – Audit Requirements.

- (a) **Audit required.** A non-Federal entity that expends \$750,000 or more during the non-Federal entity's fiscal year in Federal awards must have a single or program-specific audit conducted for that year in accordance with the provisions of this part.
- (b) **Single audit.** A non-Federal entity that expends \$750,000 or more during the non-Federal entity's fiscal year in Federal awards must have a single audit conducted in accordance with §200.514 Scope of audit except when it elects to have a program-specific audit conducted in accordance with paragraph (c) of this section.

INDICATOR 3.3: COMPLIANCE WITH GRANT CONDITIONS. The Developer grantee is compliant with Federal statutes and regulations, recordkeeping requirements, and the terms of the grant.

<i>Criteria for Meeting Indicator</i>	<i>Sample Guiding Questions</i>	<i>Examples of Acceptable Evidence</i>
<p>The grantee complies with grant conditions.</p> <p>The grantee demonstrates an adequate system for maintaining all financial and programmatic records, supporting documents, statistical records, and other records related to the CSP grant funds.</p> <p>The grantee demonstrates that it is able to produce grant-related documents in a timely manner.</p> <p>The grantee has its own, or follows established, policies and practices for the adequate retention of grant files.</p>	<p>Did ED place any specific conditions on the grant? If so, has the grantee resolved them?</p> <p>What records related to the grant funds does the grantee keep? Is there an official grant file? If so, where is it kept and who has access to it? How often is the official grant file updated?</p> <p>Describe how the grantee’s CSP grant file fully accounts for:</p> <ol style="list-style-type: none"> 1) The amount of funds under the grant 2) How the grantee uses the funds 3) The total cost of the project 4) The share of that cost provided from other sources 5) Other records to facilitate an effective audit and 6) The grantee’s compliance with program requirements <p>Has the grantee submitted Annual Performance Reports on time and complete?</p> <p>Does the grantee have written policies and practices for retaining grant records?</p>	<p>Documentation of meeting grant conditions, including correspondence indicating when a condition has been closed</p> <p>Documentation of CSP grant files maintained, including:</p> <ol style="list-style-type: none"> 1) Original grant application, approved budgets 2) Grant Award Notification 3) Correspondence with Federal Project Office 4) Annual and final performance reports 5) Corrective action notices, if applicable 6) Budget/expenditure tracking documents <p>Files and records for each partnership described in the grantee’s application that include contracts, MOUs, invoices, receipts, progress reports, deliverables, or other related materials</p> <p>Evidence of timely submission of Annual Performance Reports to ED</p> <p>Grant-related personnel lists and timesheets or amount of time/money charged to grant</p> <p>File maintenance policies and procedures</p> <p>Records retention policy and procedures</p>

Indicator Sources/References

Risk and Assessment and Special Conditions: FY 2018 and FY 2019

Consistent with 2 CFR 200.205, before awarding grants under this competition, the Departments conducts a review of the risks posed by applicants. Under 2 CFR 3473.10, the Secretary may impose special conditions and, in appropriate circumstances, high-risk conditions on a grant if the applicant or grantee is not financially stable, has a history of unsatisfactory performance; has a financial or other management system that does not meet the standards in 2 CFR part 200, subpart D; has not fulfilled the conditions prior to a grant; or is otherwise not responsible.

INDICATOR 3.3: COMPLIANCE WITH GRANT CONDITIONS. The Developer grantee is compliant with Federal statutes and regulations, recordkeeping requirements, and the terms of the grant.

Code of Federal Regulations: Title 2, Subtitle A, Chapter II, Part 200 -Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards

Subpart D – POST FEDERAL AWARD REQUIREMENTS

2 CFR 200.334 – Retention requirements for records.

Financial records, supporting documents, statistical records, and all other non-Federal entity records pertinent to a Federal award must be retained for a period of three years from the date of submission of the final expenditure report or, for Federal awards that are renewed quarterly or annually, from the date of the submission of the quarterly or annual financial report, respectively. Federal awarding agencies must not impose any other record retention requirements upon non-Federal entities.

2 CFR 200.337 – Access to records.

(a) Records of non-Federal entities. The Federal awarding agency must have the right of access to any documents, papers, or other records of the non-Federal entity which are pertinent to the Federal award, in order to make audits, examinations, excerpts, and transcripts. The right also includes timely and reasonable access to the non-Federal entity's personnel for the purpose of interview and discussion related to such documents.

2 CFR 200.339 – Remedies for noncompliance.

If a non-Federal entity fails to comply with Federal terms and conditions of a Federal award, one or more of the following may occur:

- (a) Temporarily withhold cash payments pending correction of the deficiency
- (b) Disallow all or part of the activity or action not in compliance
- (c) Wholly or partly suspend or terminate the Federal award
- (d) Initiate suspension or debarment proceedings
- (e) Withhold further Federal awards for the project or program
- (f) Take other remedies that may be legally available.

V. Indicator Source Crosswalk

Section 1: Charter School Status and Application Fidelity	Sources
<p>INDICATOR 1.1: DEFINITION OF CHARTER SCHOOL. The Developer grantee meets the Federal definition of a “charter school.”</p>	<p>ESSA Section 4310(2) NIA 2018 Application Requirement (h)(k) NIA 2019 Application Requirement (a)(4), (i)(1)(2) and (j) NIA 2019 Selection Criteria (b)(1)(ii)(iii)</p>
<p>INDICATOR 1.2: PROGRAM IMPLEMENTATION. The Developer grantee implements the educational program described in its grant application.</p>	<p>NIA 2018 Application Requirement (c)(e), (l) and (m) NIA 2019 Application Requirement (a)(5)(7), (b)(1)(2), (g) and (i)(1) NIA 2018 Selection Criteria (2)(ii) NIA 2019 Selection Criteria (2)(ii) and (3)(i)</p>
<p>INDICATOR 1.3: MANAGEMENT PLAN IMPLEMENTATION. The implementation of the Developer grantee’s management plan reflects what was described in the grantee’s application and is operational.</p>	<p>NIA 2018 Application Requirement (a) NIA 2019 Application Requirement (a)(2) NIA 2018 Selection Criteria (a)(iii)(2), (b)(iii)(2), (a)(iv) and (b)(iv) NIA 2019 Selection Criteria (a)(3)(ii), (b)(4)(ii), (a)(4) and (b)(5)</p>
<p>INDICATOR 1.4: RECRUITMENT, LOTTERY, AND ENROLLMENT. The Developer grantee informs students in the community about the charter school and gives them an equal opportunity to attend.</p>	<p>NIA 2018 Application Requirement (i) NIA 2019 Application Requirement (c)(d) ESSA Section 4303(c)(3)(A)(i) and (ii) lottery and weighted lottery</p>
Section 2: Grantee Quality	Sources
<p>INDICATOR 2.1: COMPETITION PRIORITIES. The Developer grantee addresses the competition priorities.</p>	<p>NIA 2018 Funding Opportunity Description – Competitive Preference Priorities (1)(2)(3) NIA 2019 Funding Opportunity Description – Absolute Priority (a)(b) NIA 2019 Funding Opportunity Description – Competitive Preference Priorities (1)(2)(3)(4) NIA 2019 Funding Opportunity Description – Invitational Priority (1)(2)(3)(4)</p>
<p>INDICATOR 2.2: QUALITY CONTROLS. The Developer grantee has quality controls in place to sustain the continued operations of the charter school and, in the case of closure, ensure appropriate closure protocols are used.</p>	<p>NIA 2018 Application Requirements (d) NIA 2019 Application Requirement (a)(6) NIA 2018 Selection Criteria (a)(v) and (b)(vi) NIA 2019 Selection Criteria (a)(5) and (b)(6)</p>
<p>INDICATOR 2.3: ASSISTING EDUCATIONALLY DISADVANTAGED STUDENTS. The charter school assists educationally disadvantaged students.</p>	<p>NIA 2018 Application Requirements (g)(j)(i)</p>

NIA 2019 Application Requirements (a)(1)
 NIA 2018 Selection Criteria (a)(i) and (b)(i)
 NIA 2019 Selection Criteria (a)(1) and (b)(2)

Section 3: Administrative and Fiscal Responsibilities

Sources

INDICATOR 3.1: USE OF GRANT FUNDS. The CSP grant funds are used only for allowable activities.

2 CFR 200.403 Factors Affecting Allowability of Costs
 2 CFR 200.405 Allowable Costs
 NIA 2018 Application Requirements (d) and (f)
 NIA 2019 Application Requirements (a)(6), (8) and (f)
 NIA 2018 Application and Submission Information – (4) Funding Restrictions (a)(i-ii)(A-F)
 NIA 2018 Reasonable and Necessary Costs
 NIA 2019 Reasonable and Necessary Costs

INDICATOR 3.2: FISCAL CONTROL AND FUND ACCOUNTING. The Developer grantee uses fiscal control and fund accounting procedures that meet the standards of Financial Management Systems and ensure proper disbursement of and accounting for grant funds.

2 CFR 200.302 Financial Management
 2 CFR 200.303 Internal Controls
 2 CFR 200.501 Audit Requirements
 2 CFR 200.317–327 Procurement
 2 CFR 200.112 Conflict of Interest
 2 CFR 202.313 Equipment
 2 CFR 200.426 Depreciation

INDICATOR 3.3: COMPLIANCE WITH GRANT CONDITIONS. The Developer grantee is compliant with Federal statutes and regulations, recordkeeping requirements, and the terms of the grant.

2 CFR 200.208 Specific Conditions
 2 CFR 200.334 Retention Requirements for Records
 2 CFR 200.337 Access to Records
 2 CFR 200.339 Remedies for Noncompliance
 NIA 2018 Risk and Assessment and Special Conditions
 NIA 2019 Risk and Assessment and Special Conditions